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UNITED STATES DISTRICT COURT**DISTRICT OF NEVADA**UNIBIND, INC. and UNIBIND (CYPRUS)
LIMITED,**2:05-cv-1352**

Plaintiffs,

vs.

YADA ENTERPRISE CO., LTD.

Defendant.

COMPLAINT

COMES NOW, Plaintiffs UNIBIND, INC. and UNIBIND (CYPRUS) LIMITED
(collectively "Unibind"), and together file this Complaint against YADA ENTERPRISE
CO., LTD. ("Defendant" or "Yada").

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THE PARTIES

1. Plaintiff Unibind (Cyprus) Limited is a Cyprus corporation with its principal place of business at Ayioy Procopiou Street 13, 2406 Engomi, Lefkosia, Cyprus.

2. Plaintiff Unibind, Inc. is a Georgia corporation with its principal place of business at 11810 Wills Road, Suite 100, Alpharetta, GA 30004.

3. Upon information and belief, Defendant Yada Enterprises Co., Ltd. is a Chinese entity with its principal place of business at Unit C, 20/Flr., Blk. 3, Caifu Bldg., Caitain Road, Shenzhen, China.

JURISDICTION & VENUE

4. This is an action for patent infringement and federal trademark infringement and unfair competition. This Court has jurisdiction over the patent infringement and federal trademark and unfair competition claims pursuant to 28 U.S.C. §§ 1331 and 1338, and supplemental jurisdiction over any related state common law claims pursuant to 28 U.S.C. § 1367.

5. Plaintiffs submit themselves to the jurisdiction of this Court.

6. Defendant Yada is subject to the jurisdiction of this Court by virtue of having committed certain of the acts complained of herein in Las Vegas, Nevada, during the "Paper World" trade show held between November 9-11, 2005, at the Las Vegas Convention Center. Defendant's General Manager and agent was present in Las Vegas and participated in the distribution of catalogs bearing the infringing marks and offering the infringing products for sale. Defendant is subject to the jurisdiction of this Court by virtue of its contacts with this judicial district.

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COUNT I
(INFRINGEMENT OF THE '554 PATENT)

14. Defendant is making, using, offering to sell or selling articles that embody the inventions claimed in the '554 patent.

15. Defendant's conduct constitutes patent infringement in violation of 35 U.S.C. § 271.

COUNT II
(INFRINGEMENT OF THE '050 PATENT)

16. Defendant is making, using, offering to sell or selling articles that embody the inventions claimed in the '050 patent.

17. Defendant's conduct constitutes patent infringement in violation of 35 U.S.C. § 271.

COUNT III
(FEDERAL TRADEMARK INFRINGEMENT AND UNFAIR COMPETITION)

18. Defendant is using in commerce a symbol or device or false designation of origin that is likely to cause confusion, or to cause mistake, or to deceive as to the affiliation, connection, or association of Defendant with Unibind, or as to the origin, sponsorship, or approval of Defendant's goods, services, or commercial activities by Unibind.

19. Defendant's conduct constitutes federal trademark infringement and unfair competition in violation of 35 U.S.C. § 1125(a).

20. Upon information and belief, Defendant's aforementioned conduct has been willful and intentional.

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WHEREFORE, Unibind requests that the Court:

1. Issue a preliminary and permanent injunction against Defendant's continued advertising, offering for sale and sales of any devices that infringe the '554 Patent or the '050 Patent;

2. Award Unibind its damages for Defendant's patent infringement, and treble said damages pursuant to 35 U.S.C. § 284.

3. Issue a preliminary and permanent injunction against Defendant's continued use of any trademark, symbol or logo that is a colorable imitation of Unibind's Pyramid Trademark, or that is likely to be confused with Unibind's Pyramid Trademark.

4. Award Unibind its actual damages, an accounting Defendant's profits, and Unibind's costs of this action pursuant to 15 U.S.C. § 1117.

5. Award Unibind three times its actual damages, an enhancement of Defendant's profits, and Unibind's reasonable attorney fees due to the willful and intentional nature of Defendant's infringing conduct, pursuant to 15 U.S.C. § 1117.

6. Find that this is an exceptional case, and award Unibind its attorney fees pursuant to 35 U.S.C. § 285.

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Respectfully submitted this 10th day of November 2005.

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